

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

QUALCOMM INCORPORATED,)	
a Delaware corporation; and)	
QUALCOMM TECHNOLOGIES, INC.,)	
a Delaware corporation,)	
)	
Plaintiffs,)	C.A. No. 24-490 (MN)
)	
v.)	REDACTED - PUBLIC VERSION
)	Original filing date: August 1, 2025
ARM HOLDINGS PLC., f/k/a ARM LTD.,)	Redacted filing date: August 11, 2025
a U.K. corporation,)	
)	
Defendant.)	

**PLAINTIFFS' MOTION FOR LEAVE TO AMEND THE COMPLAINT TO NAME
ARM HOLDINGS PLC. AND ARM LTD. AS INDIVIDUAL DEFENDANTS**

Pursuant to Federal Rules of Civil Procedures 15, 16, and 20, and the Court's Order referring this dispute to the Special Master (D.I. 336), Plaintiffs Qualcomm Incorporated and Qualcomm Technologies, Inc. ("Qualcomm") hereby move for leave to amend the operative Complaint to name Arm Holdings plc. and Arm Ltd. as individual Defendants instead of "Arm Holdings plc. f/k/a Arm Ltd.," and to assert each count in the Second Amended Complaint against both Defendants. The grounds for this motion are set forth in Qualcomm's letter and accompanying exhibits in support of its motion, which are being separately submitted to the Special Master in accordance with the Court's July 18, 2025 Order (D.I. 336).

Pursuant to Paragraph 8(b) of the Scheduling Order (D.I. 44) and D. Del. L.R. 15.1, a copy of Qualcomm's proposed Third Amended Complaint is attached as Exhibit A, and a "blackline" comparison between Qualcomm's proposed Third Amended Complaint and the Second Amended Complaint is attached as Exhibit B.

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August 1, 2025

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RULE 7.1.1 CERTIFICATION

Pursuant to D. Del. Local Rule 7.1.1, counsel for plaintiffs met and conferred with counsel for defendant regarding the relief sought by the foregoing motion, and Arm opposes this motion.

/s/ Jennifer Ying

Jennifer Ying (#5550)

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QUALCOMM INCORPORATED,)	
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QUALCOMM TECHNOLOGIES, INC.,)	
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Plaintiffs,)	
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v.)	C.A. No. 24-490 (MN)
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ARM HOLDINGS PLC., f/k/a ARM LTD.,)	
a U.K. corporation,)	
)	
Defendant.)	

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR LEAVE
TO AMEND THE COMPLAINT TO NAME ARM HOLDINGS PLC.
AND ARM LTD. AS INDIVIDUAL DEFENDANTS**

AND NOW, this ____ day of _____, 2025, the Court having considered
Plaintiffs' Motion and any opposition thereto;

IT IS HEREBY ORDERED that the Motion is GRANTED;

IT IS FURTHER HEREBY ORDERED that Plaintiffs shall file their proposed Third
Amended Complaint attached to the Motion as Exhibit A within 3 business days of the date of this
Order.

J.

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on August 1, 2025, upon the following in the manner indicated:

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